

Sirs,

In view of all of the confirmed negative aspects of Access BPL, including tests conducted by the ARRL in this country, as well as outright prohibitions of the technology in Japan and other countries, I am dismayed at your decision to proceed with this technology.

The fact that 'we can do it' doesn't mean that 'we should do it'. There are far better methods of providing broadband access to rural America, without causing broad interference to licensed radio services.

BPL is guaranteed to interfere with licensed radio services, and licensed radio services are guaranteed to interfere with BPL. This has already been demonstrated quite clearly in numerous test situations.

One of the points made in the NPRM was that (and I paraphrase) 'communications over power lines has been in use for many years', with specific reference to college AM radio stations, in home intercom and control systems, etc. I would point out that these systems do NOT make use of RF energy over the broad frequency spectrum proposed by Access BPL systems, and hence are incapable of producing the broad interference that Access BPL can, and will produce. Furthermore, power transmission lines, by their very nature, make excellent transmitting antennas at RF frequencies. They are guaranteed to transmit the imposed RF energies into their surroundings, and that RF will propagate for very long distances before it is attenuated sufficiently to no longer be an interference problem.

In this post 9-11 environment, with homeland security such an important issue, I find it unusual that the Commission would propose to deliberately deploy a communications technology that will seriously impact the ability of emergency communicators to perform their functions. FEMA has opposed this technology, and the NTIA (who are presently conducting their own, independant tests) has indicated that there are serious problems with Access BPL. This alone should indicate that Access BPL is ill-advised at this time.

I believe this action should be recinded as not being in the best interest of the public, and wish to register my strong opposition to deployment of any BPL systems.

For the record, I am the holder of Amateur Extra Class license KC2FYJ.